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November 15, 2021

BY ECF

Honorable Sidney H. Stein United States District Judge Southern District of New York 500 Pearl Street New York, NY 10007 **MEMO ENDORSED**

Re: <u>United States v. Joe Young et. al</u>

21 Cr. 486 (SHS)

Dear Judge Stein:

I represent Joe Young in the above-captioned case and write on behalf of him and his three co-defendants to request a 30-day adjournment of the status conference, currently scheduled for 11:00 a.m. on Friday, November 19, 2021. The Government does not object to this request.

An adjournment is appropriate because the parties have been engaged in plea negotiations with respect to Mr. Young and additional time is necessary to allow those negotiations to develop. The parties agree that the exclusion of this 30-day period from Speedy Trial Act calculations is justified because the delay is necessary to advance productive discussions about a possible pre-trial disposition. 18 U.S.C. § 3161(h)(7)(A).

The conference is adjourned to December 22, 2021, at 2:30 p.m. The time is excluded from calculation under the Speedy Trial Act from today until December 22, 2021. The Court finds that the ends of justice served by this continuance outweigh the best interests of the public and the defendants in a speedy trial pursuant to 18 U.S.C. 3161(h)(7)(A).

Dated: New York, New York November 17, 2021 Respectfully Submitted,

Andrew J. Valack, Esq. Assistant Federal Defender

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SO ORDERED

SIDNEY H. STEIN U.S.D.J.